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November 13, 2018

VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

*Re: Status of Competition in the Marketplace for Delivery of Audio
Programming, MB Docket No. 18-227*

Dear Ms. Dortch:

On November 8, 2018, Connoisseur Media, LLC, represented by Jeffrey Warshaw, Founder and Chief Executive Officer, and Townsquare Media, Inc., represented by Dhruv Prasad, Co-Chief Executive Officer, and the undersigned held separate meetings with 1) Chairman Ajit Pai and Alison Nemeth Steger, Legal Advisor to Chairman Pai; 2) Commissioner Brendan Carr and Evan Swarztrauber, Legal Advisor to Commissioner Carr; and 3) Sarah Whitesell, Deputy Chief, Media Bureau, Al Shuldiner, Chief, Audio Division, Media Bureau, Brendan Holland, Chief, Industry Analysis Division, Media Bureau, Radhika Karmarkar, Deputy Chief, Industry Analysis Division, Media Bureau, Ty Bream, Assistant Chief, Industry Analysis Division, Media Bureau, and Julie Salovaara, Attorney Advisor, Industry Analysis Division, Media Bureau.

The purpose of the meeting was to discuss audio competition issues and their impact on the radio ownership rules. In particular, it was discussed that new marketplace entrants have disrupted the competitive landscape in the audio marketplace for advertisers and listeners, much to the benefit of consumers. There is no longer a siloed audio marketplace where broadcast radio stations compete only with each other. However, these new sources of audio entertainment and information have changed the economies of legacy participants – particularly traditional AM or FM radio – which provide often essential local news, particularly in emergency situations. In addition, digital competitors like Google and Facebook have significantly affected the local advertising markets, capturing significant shares of local advertising dollars in every radio market. The growth and competitiveness of traditional broadcast radio is threatened by these changes in the marketplace – and radio is restrained from responding to these threats by the outdated structural ownership rules that have not been substantially updated since 1996. These

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regulatory barriers are not applicable to digital competitors and were adopted for a far different audio marketplace than the one that exists today.

This filing is made in accordance with Section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. § 1.1206(b)(1). In the event that there are any questions concerning this matter, please contact the undersigned.

Sincerely,

/s/ David D. Oxenford

David D. Oxenford
Danielle K. Thumann

Counsel for Connoisseur Media and
Townsquare Media

cc: Chairman Ajit Pai
Commissioner Brendan Carr
Alison Nemeth Steger
Evan Swarztrauber
Sarah Whitesell
Al Shuldiner
Brendan Holland
Radhika Karmarkar
Ty Bream
Julie Salovaara